

FILED

MAR 06 2001

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
BENTON OFFICE

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	CRIM. NO. <u>00-40101-GPM</u>
)	
RANDALL MOSS, a/k/a "Herbie,")	Title 21, United States Code,
WILLIAM MOSS, a/k/a "Billy,")	Sections 841(a)(1), 841(b)(1) and 846.
CHAD SANDERS,)	
BRAD TAYLOR, and)	Title 18, United States Code, Section 924(c)
TYREE NEAL)	
)	
Defendants)	

THIRD SUPERCEDING INDICTMENT

THE GRAND JURY CHARGES:

Count 1

From on or about 1997 through on or about November 1, 2000, in Saline County, and elsewhere within the Southern District of Illinois,

**RANDALL MOSS, a/k/a "Herbie,"
WILLIAM MOSS, a/k/a "Billy,"
CHAD SANDERS,
BRAD TAYLOR, and
TYREE NEAL**

defendants herein, did knowingly and intentionally conspire with each other, and with others known and unknown to the Grand Jury, to distribute and possess with intent to distribute more than five (5) grams of a mixture and substance containing cocaine base, (commonly known as "crack cocaine"), and cocaine, a Schedule II, narcotic controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B); all in violation of Title 21, United States Code, Section 846.

Count 2

On or about May 10, 2000, in Saline County, within the Southern District of Illinois,

WILLIAM MOSS, a/k/a “Billy,”

defendant herein, did knowingly and intentionally distribute a mixture and substance containing cocaine base (commonly known as “crack cocaine”), a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

Count 3

On or about May 25, 2000, in Saline County, within the Southern District of Illinois,

WILLIAM MOSS, a/k/a “Billy,”

defendant herein, did knowingly and intentionally distribute a mixture and substance containing cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

Count 4

On or about June 1, 2000, in Saline County, within the Southern District of Illinois,

WILLIAM MOSS, a/k/a “Billy,”

defendant herein, did knowingly and intentionally distribute a mixture and substance containing cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 5

On or about June 16, 2000, in Saline County, within the Southern District of Illinois,

WILLIAM MOSS, a/k/a “Billy,”

defendant herein, during and in relation to a drug trafficking crime, to wit: conspiracy to distribute and possess with intent to distribute a mixture and substance containing cocaine and cocaine base (commonly known as “crack cocaine”), as charged above in Count 1, did knowingly brandish a stainless/nickel plated, large caliber, semi-automatic handgun, in violation of Title 18, United States Code, Section 924(c).

Count 6

On or about July 25, 2000, in Saline County, within the Southern District of Illinois,

RANDALL MOSS, a/k/a “Herbie,”

defendant herein, did knowingly and intentionally distribute a mixture and substance containing cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

Count 7

On or about July 31, 2000, in Saline County, within the Southern District of Illinois,

RANDALL MOSS, a/k/a “Herbie,”

defendant herein, did knowingly and intentionally distribute a mixture and substance containing cocaine base (commonly known as “crack cocaine”), a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

Count 8

On or about September 12, 2000, at 12:45 p.m., in Saline County, within the Southern District of Illinois,

CHAD SANDERS,

defendant herein, did knowingly and intentionally distribute a mixture and substance containing cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

Count 9

On or about September 12, 2000, at 10:45 p.m., in Saline County, within the Southern District of Illinois,

CHAD SANDERS,

defendant herein, did knowingly and intentionally distribute a mixture and substance containing cocaine base (commonly known as “crack cocaine”), a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

Count 10

On or about September 13, 2000, in Saline County, within the Southern District of Illinois,

CHAD SANDERS,

defendant herein, did knowingly and intentionally distribute a mixture and substance containing cocaine base (commonly known as “crack cocaine”), a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

Count 11

On or about September 13, 2000, in Saline County, within the Southern District of Illinois,

RANDALL MOSS, a/k/a “Herbie,”

defendant herein, did knowingly and intentionally distribute a mixture and substance containing cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

Count 12

On or about September 14, 2000, in Saline County, within the Southern District of Illinois,

BRAD TAYLOR,

defendant herein, did knowingly and intentionally distribute a mixture and substance containing cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

Count 13

On or about September 14, 2000, in Saline County, within the Southern District of Illinois,

**CHAD SANDERS and
TYREE M. NEAL,**

defendants herein, did knowingly and intentionally distribute a mixture and substance containing cocaine and cocaine base (commonly known as “crack cocaine”), Schedule II narcotic controlled substances, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

Count 14

On or about September 19, 2000, in Saline County, within the Southern District of Illinois,

RANDALL MOSS, a/k/a "Herbie,"

defendants herein, did knowingly and intentionally distribute a mixture and substance containing cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

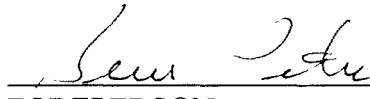
Count 15

On or about November 15, 2000, in Saline County, within the Southern District of Illinois,

RANDALL MOSS, a/k/a "Herbie,"

defendant herein, having previously been convicted of a felony punishable by imprisonment for a term exceeding one year, to wit: Unlawful Possession of a Weapon by a Felon, 88-CF-114, on February 16, 1989, in the Circuit Court of the First Judicial Circuit, Saline County, Illinois, did knowingly possess, in and affecting commerce, a Smith & Wesson Model 10-5, .38 caliber revolver, serial number D649429, in violation of Title 18, United States Code, Section 922(g)(1).

A TRUE BILL



FOREPERSON



W. CHARLES GRACE
United States Attorney

Recommended Bond: Detention